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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ELIZABETH ANNE DEVAN-SONG,

Case No.: 6:20-cv-02126-MC

Plaintiff,

DECLARATION OF MELISSA J.
HEALY IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO APPEAR

v.

OREGON STATE UNIVERSITY and
PENELOPE DAUGHERTY,

Defendant.

I, Melissa J. Healy, declare:

1. I am counsel for defendants Oregon State University and Penelope Daugherty in this matter. I make this declaration based on my personal knowledge of the facts and circumstances described.

2. Defendants request an extension of time to respond to plaintiff's complaint from January 27, 2021 to March 8, 2021 (60 days from the date when defendants accepted service of the complaint by email at plaintiff's request). The extension is necessary because my firm was recently retained and needs time to obtain and review background information to prepare a responsive pleading. Additionally, defense counsel has other time-sensitive matters pending, including an arbitration scheduled for February 3-4, 2021.

3. I conferred with plaintiff's counsel regarding this motion. Plaintiff's counsel stated that she would not object to an extension until February 15, 2021 and also stated that plaintiff intended to file an amended complaint.

4. This is defendants' first request for an extension.

5. The requested extension is not sought for any improper purpose or to cause undue delay.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: January 26, 2021.

/s/ Melissa J. Healy

Melissa J. Healy